

UNITED STATES DISTRICT COURT
For the
Southern District of New York

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K.W., on behalf of himself and his Infant child, K.A.

Plaintiff(s)
v.

ANSWER
Civil Action No. 22-CV8889 (NRB)

THE CITY OF NEW YORK, AMAR MOODY, THE
CHILDREN'S AID SOCIETY, and BRIAN GOMEZ

Defendant(s)

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The defendant, by their Attorney, James Cammarata, Esq., as and for a Verified Answer to the Complaint of the Plaintiffs herein, the Defendant, THE CHILDREN'S AID SOCIETY, respectfully alleges as follows:

1. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's Paragraph's 1-77.

ANSWERING THE FIRST CAUSE OF ACTION

2. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (First Claim) Paragraph 78.

3. Denies each and every allegation contained in Plaintiff's (First Claim) Paragraph 80.

4. Denies each and every allegation contained in Plaintiff's (First Claim) Paragraph 81.
5. Denies each and every allegation contained in Plaintiff's (First Claim) Paragraph 82.
6. Denies each and every allegation contained in Plaintiff's (First Claim) Paragraph 83.
7. Denies each and every allegation contained in Plaintiff's (First Claim) Paragraph 84.

ANSWERING THE SECOND CAUSE OF ACTION

8. Defendant reiterates each and every answer contained in paragraphs 1-84, as though more fully set forth herein at length.
9. Denies each and every allegation contained in Plaintiff's (Second Claim) Paragraph 85.
10. Denies each and every allegation contained in Plaintiff's (Second Claim) Paragraph 86.
11. Denies each and every allegation contained in Plaintiff's (Second Claim) Paragraph 87.
12. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Second Claim) Paragraph 88.
13. Denies each and every allegation contained in Plaintiff's (Second Claim) Paragraph 89.

ANSWERING THE THIRD CAUSE OF ACTION

14. Defendant reiterates each and every answer contained in paragraphs 1-89, as though more fully set forth herein at length.

15. Denies each and every allegation contained in Plaintiff's (Third Claim) Paragraph 90.

16. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Third Claim) Paragraph 91.

17. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Third Claim) Paragraph 92.

18. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Third Claim) Paragraph 93.

19. Denies each and every allegation contained in Plaintiff's (Third Claim) Paragraph 94.

20. Denies each and every allegation contained in Plaintiff's (Third Claim) Paragraph 95.

21. Denies each and every allegation contained in Plaintiff's (Third Claim) Paragraph 96.

22. Denies each and every allegation contained in Plaintiff's (Third Claim) Paragraph 97.

23. Denies each and every allegation contained in Plaintiff's (Third Claim) Paragraph 98.

24. Denies each and every allegation contained in Plaintiff's (Third Claim) Paragraph 99.

25. Denies each and every allegation contained in Plaintiff's (Third Claim) Paragraph 100.

26. Denies each and every allegation contained in Plaintiff's (Third Claim) Paragraph 101.

27. Denies each and every allegation contained in Plaintiff's (Third Claim) Paragraph 102.

ANSWERING THE FOURTH CAUSE OF ACTION

28. Defendant reiterates each and every answer contained in paragraphs 1-102, as though more fully set forth herein at length.

29. Denies each and every allegation contained in Plaintiff's (Fourth Claim) Paragraph 103.

30. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fourth Claim) Paragraph 104.

31. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fourth Claim) Paragraph 105.

32. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fourth Claim) Paragraph 106.

33. Denies each and every allegation contained in Plaintiff's (Fourth Claim) Paragraph 107.

34. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fourth Claim) Paragraph 108.

35. Denies each and every allegation contained in Plaintiff's (Fourth Claim) Paragraph 109.

36. Denies each and every allegation contained in Plaintiff's (Fourth Claim) Paragraph 110.

37. Denies each and every allegation contained in Plaintiff's (Fourth Claim) Paragraph 111.

38. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fourth Claim) Paragraph 112.

ANSWERING THE FIFTH CAUSE OF ACTION

39. Defendant reiterates each and every answer contained in paragraphs 1-112, as though more fully set forth herein at length.

40. Denies each and every allegation contained in Plaintiff's (Fifth Claim) Paragraph 113.

41. Denies each and every allegation contained in Plaintiff's (Fifth Claim) Paragraph 114.

42. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fifth Claim) Paragraph 115.

43. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fifth Claim) Paragraph 116.

44. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fifth Claim) Paragraph 117.

45. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fifth Claim) Paragraph 118.

46. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fifth Claim) Paragraph 119.

47. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fifth Claim) Paragraph 120.

48. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fifth Claim) Paragraph 121.

49. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fifth Claim) Paragraph 122.

50. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Fifth Claim) Paragraph 123.

51. Denies each and every allegation contained in Plaintiff's (Fifth Claim) Paragraph 124.

52. Denies each and every allegation contained in Plaintiff's (Fifth Claim) Paragraph 125.

53. Denies each and every allegation contained in Plaintiff's (Fifth Claim) Paragraph 126.

54. Denies each and every allegation contained in Plaintiff's (Fifth Claim) Paragraph 127.

55. Denies each and every allegation contained in Plaintiff's (Fifth Claim) Paragraph 128.

56. Denies each and every allegation contained in Plaintiff's (Fifth Claim) Paragraph 129.

ANSWERING THE SIXTH CAUSE OF ACTION

57. Defendant reiterates each and every answer contained in paragraphs 1-129, as though more fully set forth herein at length.

58. Denies each and every allegation contained in Plaintiff's (Sixth Claim) Paragraph 130.

59. Denies each and every allegation contained in Plaintiff's (Sixth Claim) Paragraph 131.

60. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 132.

61. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 133.

62. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 134.

63. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 135.

64. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 136.

65. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 137.

66. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 138.

67. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 139.

68. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 140.

69. Denies each and every allegation contained in Plaintiff's (Sixth Claim) Paragraph 141.

70. Denies each and every allegation contained in Plaintiff's (Sixth Claim) Paragraph 142.

71. Denies each and every allegation contained in Plaintiff's (Sixth Claim) Paragraph 143.

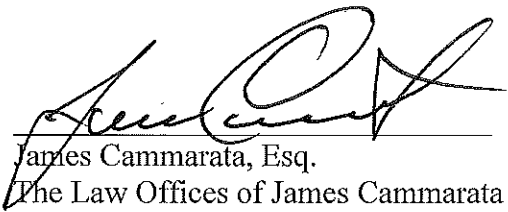
72. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 144.

73. Denies having enough knowledge or information sufficient to form a belief as to the information contained in Plaintiff's (Sixth Claim) Paragraph 145.

74. Denies each and every allegation contained in Plaintiff's (Sixth Claim) Paragraph 146.

WHEREFORE, answering Defendant, The Children's Aid Society demands Judgment dismissing the Complaint herein, together with interest, costs, disbursements or judgment over, as may be required by law.

Dated: Oyster Bay, New York
April 15, 2014



James Cammarata, Esq.
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